

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

v.

Case: 2:21-cr-20216  
Assigned To : Michelson, Laurie J.  
Referral Judge: Stafford, Elizabeth A.  
Assign. Date : 3/29/2021  
Description: INFO USA V. BONE (NA)

Sean Bone,

Defendant.

Violation: 21 U.S.C. § 841(a)(1)

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**INFORMATION**

THE UNITED STATES ATTORNEY CHARGES

**COUNT ONE**

21 U.S.C. §§ 841(a)(1)-Possession with Intent to Distribute Controlled Substances

1. On or about October 26, 2019, in the Eastern District of Michigan, the defendant, Sean Bone, knowingly and intentionally possessed with intent to distribute a measurable amount of cocaine hydrochloride and cocaine base, Schedule II controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

**FORFEITURE ALLEGATION**

2. Pursuant to Fed. R. Cr. P. 32.2(a), the government hereby provides notice to the defendant of its intention to seek forfeiture of all proceeds, direct or indirect, or property traceable thereto, all property that facilitated the commission of the violations alleged, or property traceable thereto, and all property involved in, or

property traceable thereto, of the violations set forth in this Second Superseding Information.

3. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of Defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

Saima Mohsin  
Acting United States Attorney

*Julie A. Beck*

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JULIE BECK  
Chief, Drug Task Force

*Andrew Lievense*

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ANDREW LIEVENSE  
Assistant United States Attorney

Dated: 3/29/2021

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number: 21-cr-20216
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based on LCrR 57.10(b)(4) <sup>1</sup> :	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: AJL

**Case Title:** USA v. Sean Bone

**County where offense occurred:** Oakland

**Offense Type:** Felony

Information -- **No** Prior Complaint

### Superseding Case Information

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Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

**Reason:** Additional defendant

<b>Defendant Name</b>	<b>Charges</b>	<b>Prior Complaint (if applicable)</b>
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**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case**

March 29, 2021  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Andrew Lievense  
Assistant United States Attorney  
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Bar #: P68925

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.